



Department of Energy

Washington, DC 20585

OCT 24 2002

QA: QA

R. W. Andrews
Bechtel SAIC Company, LLC
1180 Town Center Drive, M/S 423
Las Vegas, NV 89144

ISSUANCE OF DEFICIENCY REPORT (DR) BSC(O)-03-D-014 RESULTING FROM AN OBSERVATION BY FLOYD H. DOVE

Enclosed is DR BSC(O)-03-D-014 generated as a result of an observation.

Please provide a response to this deficiency that meets the applicable requirements of Administrative Procedure (AP) 16.1Q, *Management of Conditions Adverse to Quality*. Send the original of your responses to Deborah G. Opielowski, Navarro Quality Services, P.O. Box 364629, Mail Stop 455, North Las Vegas, Nevada 89036-8629. Initial response to the DR is due ten working days from the date of this letter. Any extensions to this due date must be requested in accordance with AP-16.1Q.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Floyd H. Dove at (702) 794-5025.

James Blaylock
R. Dennis Brown, Director
Office of Quality Assurance

OQA:JB-0167

Enclosure:
DR BSC(O)-03-D-014

cc w/encl:
N. K. Stablein, NRC, Rockville, MD
Robert Latta, NRC, Las Vegas, NV (2 cys)
S. W. Lynch, State of Nevada, Carson City, NV
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OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C

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8. ☒ Deficiency Report
☐ Corrective Action Report

No. BSC(O)-03-D-014

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QA: QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document: (Document ID and Revision or Date)

(1) AP-3.10Q, Revision 2, ICN 5; and (2) AP-3.15Q, Revision 3, ICN 0.

2. Related Report No :

N/A

3. Responsible Organization:

BSC Science and Analysis Project

4. Discussed With:

Darren Jolley, Terry Steinborn, and Steven Swenning

5. Requirement:

- (1) Section 3.2, Definition of Assumption: "A statement or proposition that is taken to be true in the absence of direct confirming data or evidence."
(2) Attachment 4, Input Status Decision Checklist: Data that are unqualified receive a "TBV" as an input status.

6. Description of Condition:

- (1) Contrary to the definition of assumption (made in the absence of data), unqualified data have been directly used as input to models (and potentially other analyses) documented in Analysis and Model Reports (AMR) by calling them "assumptions." Two examples are:
- A. ANL-EBS-MD-000045, Revision 00, ICN 03, *In-Drift Precipitates/Salts Analysis*, page 26: "For FE and AL, the input values are approximated from additional data tabulated in Harrar et al. (1990). These values are based on few data and, like the major ions, are assumed to approximate representative J-13 sample concentrations (Assumption 5.2.5)."
 - B. ANL-EBS-MD-000038, Revision 00, ICN 01, *In-Drift Microbial Communities*, page 31: "The rationale for this assumption is that the values similar to this are present in the groundwater at Yucca Mountain (Harrar et al. 1990 and CRWMS M&O 1997b). CRWMS M&O (1997b, page 10) presents a discussion on the groundwater content of DOC where the mean and distribution of DOC in J-13 compares to the mean and distribution in wells in the Death Valley region and other locations within the United States."
- (2) Contrary to the guidance for selection criteria presented in the "Input Status Decision Checklist" (which should result in a "TBV" designation), the DIRS Input Status (Column 4) for the subject AMRs were incorrectly labeled as "N/A-Reference Only" when the cited text in the examples of Item 1 (above) indicated that the data were directly used as model input.

Has work been stopped? ☐ Yes ☒ No

7. Initiator:

Floyd H. Dove

9 Does a stop work condition exist?

☐ Yes ☒ No ☐ N/A

Printed Name

Signature

Date

If Yes, Check One:

☐ A

☐ B

☐ C

☐ D

10 Recommended Actions:

NONE.

11. QAR Review

Floyd H. Dove

12 Response Due Date:

10 Working days after issuance.

Printed Name

Signature

Date

13. QAM Issuance Approval.

R. Dennis Brown

Printed Name

Signature

Date

14. Corrective Actions Verified/Closure:

15 QAM Closure Approval:

QAR Printed Name

Signature

Date

Printed Name

Signature

Date

ENCLOSURE